

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ SECURITIES
LITIGATION

Case No. 1:19-cv-01339

Honorable Robert M. Dow, Jr.

CITY OF HOLLYWOOD POLICE
OFFICERS' RETIREMENT SYSTEM,
Individually, and on Behalf of All Others
Similarly Situated,

Case No. 1:20-cv-01970

Honorable Sharon Johnson Coleman

Plaintiff,

v.

THE KRAFT HEINZ COMPANY, 3G
CAPITAL PARTNERS, 3G CAPITAL, INC.,
3G GLOBAL FOOD HOLDINGS, L.P., 3G
GLOBAL FOOD HOLDINGS GP LP, 3G
CAPITAL PARTNERS LP, 3G CAPITAL
PARTNERS II LP, 3G CAPITAL PARTNERS
LTD., BERNARDO HEES, PAULO
BASILIO, and ALEXANDRE BEHRING,

Defendants.

**LEAD PLAINTIFFS' MOTION TO CONSOLIDATE
RELATED CASE AND VACATE PSLRA NOTICE**

Lead Plaintiffs Union Asset Management Holding AG ("Union") and Sjunde AP-Fonden ("AP7") (collectively, "Lead Plaintiffs"), through their undersigned counsel, move this Court for entry of an Order: (1) consolidating *City of Hollywood Police Officers' Retirement System v. The Kraft Heinz Co.*, No. 1:20-cv-1970-SJC (N.D. Ill. Mar. 25, 2020) ("*Hollywood Police*") with *In re Kraft Heinz Securities Litigation*, No. 1:19-cv-1339 (N.D. Ill. Feb 24, 2019) (the "Consolidated Action") pursuant to Fed. R. Civ. P. 42; and (2) vacate the Private Securities Litigation Reform

Act (“PSLRA”) notice issued by City of Hollywood Police Officers’ Retirement System on March 28, 2020, inviting lead plaintiff motions in the *Hollywood Police* action on May 27, 2020.

This motion is supported by the accompanying Memorandum of Law in Support of Lead Plaintiffs’ Motion to Consolidate Related Cases and Vacate PSLRA Notice, the Declaration of Sharan Nirmul and exhibits annexed thereto, prior pleadings and proceedings, and such other written and oral argument as may be permitted by the Court.

Dated: April 3, 2020

Respectfully submitted,

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

/s/ Sharan Nirmul

Sharan Nirmul (# 90751)
Richard A. Russo, Jr. (*pro hac vice*)
Nathan A. Hasiuk (*pro hac vice*)
Lauren McGinley (*pro hac vice*)
280 King of Prussia Road
Radnor, Pennsylvania 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056
Email: snirmul@ktmc.com
rrusso@ktmc.com
nhasiuk@ktmc.com
lmcginley@ktmc.com

Counsel for Co-Lead Plaintiff Sjunde AP-Fonden and additional named Plaintiff Booker Enterprises Pty Ltd. and Co-Lead Counsel for the Class

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Salvatore J. Graziano (*pro hac vice*)
Katherine M. Sinderson (*pro hac vice*)
Abe Alexander (*pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
Email: salvatore@blbglaw.com

katiem@blbglaw.com
abe.alexander@blbglaw.com

Avi Josefson
875 North Michigan Avenue, Suite 3100
Chicago, Illinois 60611
Telephone: (312) 373-3880
Facsimile: (312) 794-7801
Email: avi@blbglaw.com

*Counsel for Co-Lead Plaintiff Union Asset
Management Holding AG and Co-Lead
Counsel for the Class*